

# Exhibit D

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KATHERINE CALAVAN, individually and )  
On behalf of all others similarly situated, )

Plaintiff, )

No. 21-CV-00185

v. )

FIRST LOVE INTERNATIONAL )  
MINISTRIES, STEVEN JOHNSON, )  
JERRY WINSLOW, PAUL LONER, )  
PHILIP GUSKE, ROBERT OPPERMAN, )  
PHOEBE WILHELM, DALE GRAY, )  
THOMAS CLINTON, ROBERT )  
CLINTON, LOVING INDEED, INC., and )  
JOHN DOE CO-CONSPIRATORS 1-100, )

Defendants. )

**DECLARATION OF ELIZABETH A. FEGAN, ESQ. IN SUPPORT OF PLAINTIFF'S  
EX PARTE AND EMERGENCY MOTION FOR PROTECTIVE ORDER**

I, Elizabeth A. Fegan, Esq., under oath, declare and state as follows:

1. I am the lawyer primarily responsible for prosecuting this matter. I am the Managing Member of Fegan Scott LLC and have full knowledge of the matters stated herein.

2. Rule 65(b) of the Federal Rules of Civil Procedure requires that the movant's attorney certify in writing any efforts made to give notice and the reasons why it should not be required.

3. Here, I have not attempted to provide notice to the Defendants.

4. I have spoken on multiple occasions to both the social worker and lawyer for the Care Leavers who are being intimidated and harassed by First Love to cause them to refrain from sharing the abuse they suffered by First Love with this Court or other authorities.

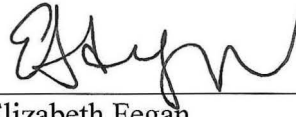
5. Based on those discussions, I am highly concerned the public filing and notice of

this motion will cause further retaliation and harm to the Care Leavers absent a temporary restraining order.

6. Based on the affidavits submitted with this Motion, I am requesting a TRO without notice and further requesting that a protective order is entered to maintain the confidentiality of the Care Leavers' names.

I declare, under penalty of perjury, that the foregoing is true and correct.

Signed this 1<sup>st</sup> day of June 2021

A handwritten signature in black ink, appearing to read 'Elizabeth Fegan', written over a horizontal line.

Elizabeth Fegan